

RUBINSTEIN & COROZZO, LLP
COUNSELORS AT LAW

RONALD RUBINSTEIN
JOSEPH R. COROZZO

RAHIL KAMRAN-RAD

260 MADISON AVENUE
22ND FLOOR
NEW YORK, N.Y. 10016

TELEPHONE (212) 545-8777
FAX (212) 679-1844

June 22, 2011

The Hon. Judge Dora Lizette Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: USA v. Dragonetti et al, 1:11-cr-00003-DLI

Dear Judge Izzary,

I write in reference to the Government's letter of June 17, 2011 in which certain "potential conflicts of interest" are cited and a *Curcio* waiver is requested. Mr. Dragonetti, having been advised of the cited potential conflicts of interest, agrees with the Government's position that such conflicts are waivable. Further, Mr. Dragonetti, having been advised by co-counsel Marc Fernich, Esq., is prepared to place his waiver of conflicts on the record at the next scheduled status conference.

However, if the Court were in need of further information related to the "potential conflicts," Counsel would be able to file an opposition to disqualification citing other court decisions declaring the cited conflicts as merely "potential" and waivable. Such a response if necessary could be submitted by July 8, 2011

Respectfully submitted,

/s _____
Joseph Corozzo

cc: All counsel via ECF